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Bruce K. Cox
Government Affairs Director

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NOV 21 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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November 21, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D. C. 20554

Re: Ex Parte - CC Docket 96-98
Implementation of the Local Competition Provisions
of the Telecommunications Act of 1996

Dear Mr. Caton:

On Wednesday, November 21, 1996, Mr. Michael Hou, Ms. Karen Weis and I met with Mr. Richard Welch, Mr. Paul Gallant, Ms. Lisa Gelb, Mr. Kalpak Gude, Mr. Robert McDonald and Mr. Robert Tanner of the Policy and Program Planning Division of the Commission's Common Carrier Bureau to discuss the experiences of AT&T in negotiating for operational support systems parity. We also discussed steps the FCC could take to implement the unbundled elements, as described in the first attachment.

The second attachment summarizes activities in the Alliance for Telecommunications Industry Solutions (ATIS) national forums. The industry has been working on all three phases of national standards development to ensure communications between local service providers' operations support systems are understood and recognized. The three phases include determination of information required to be communicated, creating standard formats or data mapping, and determination of the transport medium for the physical transfer of information.

Each phase of standards development is ongoing. However, the determination of a comprehensive set of information requirements and data mapping are necessary before any information can be transmitted

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through electronic interfaces, regardless of the transport medium selected by carriers. To forego requirements and data mapping would result in paper or paper/fax processes, requiring CLECs to use discriminatory, ineffective, and inefficient means of communicating with ILECs.

Given the diligence of the industry in working local issues to closure, as well as reusing standards developed for access services, significant work has been completed in the industry forums. As a result, it should now be possible to resolve remaining issues concerning national standards development for information requirements and data mapping no later than April of 1997 for the comprehensive set of local exchange services, unbundled elements, and combinations.

The final attachment is AT&T's Letter Concerning Electronic Interfaces filed October 30, 1996 with the Georgia Public Service Commission. This report outlines AT&T's concerns with the development of electronic interfaces offered by BellSouth pursuant to the Georgia PSC's orders. This report documents concerns AT&T has described to that Commission in discussion with staff on parity access to ILEC operations support systems.

Due to the late hour in which the meeting concluded and due to the press of other business, in accordance with Section 1.1206(a)(1) of the Commission's Rules, two (2) copies of this Notice are being submitted to the Secretary of the FCC on the next business.

Sincerely,

Bruce K. Cox

Attachments (3)

cc: Mr. Welch
Mr. Gallant
Ms. Gelb
Mr. Gude
Mr. McDonald
Mr. Tanner

Two Steps to Implement the Unbundled Platform

- Step 1:

Common elements are ordered and provisioned for entire service area (includes transport and tandem switching, signaling, data bases)

- Step 2:

Customer specific elements (local switching and loop) ordered and provisioned on per line basis

Step 1: Common Elements

- Routing tables established and installed for local switch(es) from which customers will be served
- Dedicated transport (if any) provisioned
- Common transport/tandem switching and data base access ordered on an as-used basis (no new provisioning necessary)
- OS/DA capacity/branding (if ordered from ILEC)

Step 2: Customer-Specific Elements

- Loop and switching ordered in combination
- Switching order includes application of desired features on a per line basis (similar to TSR order)
- Provisioned via recent change to apply new routing and feature parameters to existing port
- No physical reconfiguration required: software- only change

STATUS OF INDUSTRY GUIDELINES AND STANDARDS

11/20/96

	Information Requirements	Data Mapping	Data Transport
Pre-ordering	Under consideration at O&P Committee of OBF. Expected resolution to initial closure: 12/96.	Expect both EDI and CMIP mapping to be done to accommodate the needs of all carriers.	Recommendations under consideration by ECIC Committee of TCIF.
Ordering and Provisioning (includes: common network requirements, service specific requirements, and post-completion support)	80-85% complete to initial closure at O&P Committee of OBF.	Mapping of defined information requirements by EDI SOSC Committee of TCIF is substantially complete; expect to go to balloting 1/97.	Recommendations under consideration by ECIC Committee of TCIF.
Maintenance (Fault Management)	Complete: using existing interexchange access guidelines.	Substantially complete: using existing interexchange access guidelines as defined in the ECIC TRFD1 document.	Complete: using existing interexchange access guidelines (T1.227 & T1.228) for CMIP.
Billing: End User Support Information	Majority of work complete to initial closure at Message Processing Committee of OBF.	Expect to use existing interexchange access guidelines for EMR/EMI record format.	Expect to use existing interexchange access guidelines for Connect:Direct batch processing.
Billing: Wholesale Support Information	Majority of work complete to initial closure at Billing Committee of OBF.	Expect to use existing interexchange access guidelines for CABS record format.	Expect to use existing interexchange access guidelines for Connect:Direct batch processing.

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October 30, 1996

Ms. Terri M. Lyndall, Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334

Re: DOCKET NO. 6352-U Petition of AT&T for the Commission to Establish
Resale Rules, Rates, Terms and Conditions and the Initial Unbundling of Services

Dear Ms. Lyndall:

Enclosed for filing in the above-referenced matter are the original and
twenty-seven (27) copies of **AT&T's Letter Concerning Electronic
Interfaces** in the above-referenced dockets.

Please stamp the copies, returning two to me for my files. Copies have
been served upon all parties of record as shown on the attached certificate
of service. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Roxanne Douglas".
Roxanne Douglas

Enclosures

cc: Hon. Dave Baker, Chairman
Hon. Robert B. Baker
Hon. Mac Barber
Hon. Bob Durden
Hon. Stan Wise
Nancy G. Gibson, Esq.
All Parties of Record



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October 30, 1996

Room 4048
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Ms. Terri M. Lyndall, Executive Secretary
Georgia Public Service Commission
244 Washington St. SW
Atlanta, Georgia 30334

Re: Petition of AT&T for the Commission to Establish Resale
Rules, Rates, Terms, and Conditions and the Initial Unbundling
of Services; Docket No. 6352-U

Dear Ms. Lyndall:

Enclosed is a report to the Georgia Public Service Commission ("Commission") outlining AT&T's concerns with BellSouth's development of electronic interfaces pursuant to this Commission's Orders of June 11 and July 11, 1996. For all the reasons discussed below, AT&T has serious concerns regarding BellSouth's compliance with the Commission's Orders.

Specifically, in its original and amended Orders in this Docket, the Commission ordered BellSouth to implement electronic interfaces and submit monthly surveillance reports on BellSouth's progress in implementing such interfaces for pre-ordering, ordering, maintenance and trouble reporting, and daily usage data. AT&T has attempted to work with BellSouth to develop the necessary interfaces to enable AT&T and other new entrants to provide consumers with local services at parity with that provided by BellSouth.

AT&T believes, and worked under the Commission's directive that "it is imperative that a reseller have access to the same service ordering provisions, service trouble reporting, and informational databases for their customers as does BellSouth. These interfaces shall provide access to resellers for their customers which is equivalent to that of the incumbent LEC." AT&T also understood BellSouth to be working under this same directive and in accordance with its June 21, 1996, report to the Commission. In that report, which this Commission relied upon in amending its Order on July 11, 1996, BellSouth represented to the Commission that it was pursuing "a standards-based, gateway solution." The term "gateway" is well known in the industry to mean an electronic interface between two computer systems whereby the interface performs validation, translation, and routing of exchanged information between the two systems and each computer

system can be modified and maintained independently, provided the information each sends to the other continues to comply with the interface standard.

BellSouth now appears to be moving far afield from the Commission's Order in several areas.

First, BellSouth failed to provide the Commission the required technical specifications by August 15, 1996 for pre-ordering, ordering and maintenance, instead filing with this Commission high-level conceptual information that lacked the details necessary for AT&T to move forward with its local service plans. Second, and more fundamentally, based on BellSouth's reports to this Commission and several recent meetings between AT&T and BellSouth, BellSouth is moving forward with an Internet "web-based" solution, as opposed to a "gateway" solution. As explained below and in the attached report, BellSouth's web-based solution is nothing more than a camouflaged attempt to maintain the manual system this Commission has previously rejected.

Put simply, BellSouth's web-based solution design for pre-ordering and ordering, and direct access for maintenance and repair interfaces does not meet AT&T's needs, nor those of other new entrants.

Specifically, BellSouth's web architecture requires new entrants to manually duplicate pre-ordering and ordering inputs on multiple computer screens (each requiring log-ons and log-offs) while the customer holds on the phone. For AT&T, this would require an AT&T customer service representative to first log on to BellSouth's web-server to obtain and enter necessary information and then log on to AT&T's system and repeat the same entries previously made into the BellSouth system. BellSouth's customers would not experience the same delay.

Additionally, BellSouth's web architecture also introduces unnecessary additional human intervention, thus decreasing order accuracy and adversely affecting customer service. To avoid this duplicate manual input scenario, AT&T and other similarly situated new entrants would be forced to develop software and procure new hardware to accommodate BellSouth's proprietary interface. Any changes by BellSouth to BellSouth's system would require additional development by AT&T and other new entrants.

Finally, because of throughput capacity limitations, BellSouth's web approach is ill-suited to large volume users like AT&T. All in all, BellSouth's web approach is anti-competitive because it will have the effect of providing BellSouth with a distinct "customer service" advantage over AT&T and other new entrants.

Although BellSouth's web-based solution may sound like an "electronic interface," it is not because repetitive manual and human intervention is still necessary. Implementation of a web-based solution to support competition in the

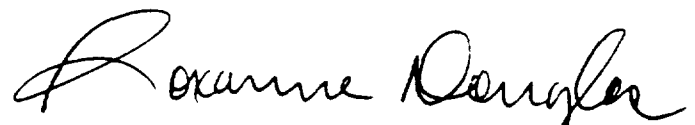
local telecommunications industry will create barriers to entering the local exchange market. If new entrants are forced to accept such interfaces, they will incur significantly higher costs and provide inferior customer service than if electronic interfaces are built upon a gateway and existing industry standards. In other words, higher costs and inferior customer service will limit competition and prevent the full benefits of competition from accruing to Georgia consumers because it will not allow AT&T and other new entrants to provide their customers with the same level of service available to BellSouth for its own customers.

Additionally, BellSouth's latest plans do not comply with the Commission's Orders in this Docket or the FCC Order implementing the Telecommunications Act of 1996, and do not meet the needs of AT&T. Moreover, BellSouth did not work collaboratively with AT&T, as required by the Commission's Orders, in developing its latest plans. Finally, BellSouth's plans are contrary to the language previously agreed to in negotiations. That language, consistent with the Georgia Order, provided that interfaces for resale "shall be administered through a gateway that will serve as a point of contact for the transmission of such data from AT&T to BellSouth and from BellSouth to AT&T."

More information regarding AT&T's objections and concerns is provided in the attached report. Consistent with the Orders of this Commission, AT&T requires electronic interfaces solutions that will:

- comply with the Georgia PSC and FCC Orders;
- be developed and extrapolated from existing industry standards;
- maximize the efficiency and effectiveness of all industry participants, not just the smaller, low-volume new entrants and meet the non-discriminatory test required by the 1996 Telecommunications Act;
- be based on, and will therefore meet the needs of new entrants as described in the record in this docket and provided to BellSouth by AT&T in the Joint Implementation Team; and
- provide AT&T and other new entrants with interfaces that allow AT&T and other new entrants to have access equal to that which BellSouth provides itself.

Sincerely,

A handwritten signature in cursive script, reading "Roxanne Douglas". The signature is written in dark ink and is positioned below the "Sincerely," text.

Enclosures

cc: Hon. Dave N. Baker, Chairman

Hon. Robert B. Baker

Hon. Mac Barber

Hon. Bob Durden

Hon. Stan Wise

Nancy G. Gibson, Esq.

All Parties of Record

CERTIFICATE OF SERVICE

DOCKET NO. 6352-U

This is to certify that I have served copies of **AT&T'S Letter Concerning Electronic Interfaces** upon all parties of record by depositing same in the United States Mail, postage prepaid, this thirtieth day of October, 1996:

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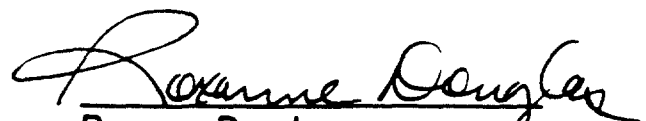
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Roxanne Douglas

**AT&T Report to the
Georgia Public Service Commission**

October 30, 1996

**Concerns Regarding BellSouth's Development of Operational
Interfaces Pursuant to Georgia PSC Order, July 11, 1996**

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attachments	AT&T Electronic Interface Specifications Document (September 20, 1996) BellSouth Operations Interface Specifications Document (August 15, 1996) BellSouth Web Pages - "Chariman's Corner" and "CollegeConnection" web ordering approach example

Purpose and Background

Purpose: AT&T is submitting this report to the Georgia Public Service Commission (PSC) to outline AT&T's concerns regarding BellSouth's development of operational interfaces pursuant to the Georgia PSC Order of July 11, 1996. Based on information contained in recently filed BellSouth surveillance reports and obtained during recent meetings with BellSouth, AT&T is concerned that BellSouth's proposed proprietary interfaces (1) do not meet the requirements of the July 1996 Georgia PSC Order, (2) depart from the Order's directive for joint and cooperative development, (3) do not meet the needs of Competitive Local Exchange Carriers (CLECs) including AT&T and, (4) discriminate against new entrants by placing CLECs at a customer service competitive disadvantage.

Background: Since September 1995, AT&T has been negotiating with BellSouth for operational interfaces that will make choice a reality for Georgia's residential and business customers. From the start, AT&T's objective has been to utilize systems that are at parity with BellSouth's internal systems and that will provide customers with at least the same level of service, quality, and response time as that provided by BellSouth to its customers. To that end, AT&T shared its requirements and specifications with BellSouth (see attached timeline). These specifications purposefully envelop and build from existing industry standards for data communications. These standards will allow AT&T and other CLECs to provide customers with at least the same level of service they currently receive from BellSouth. Additionally, such industry standards allow each CLEC provider to refine and differentiate their own *service delivery systems* without being held captive to BellSouth's proprietary systems.

This report provides AT&T's specific concerns with BellSouth's design of operational interfaces. Put simply, BellSouth's "web browser" design for pre-ordering and ordering, and direct access for maintenance and repair interfaces do not meet AT&T's needs nor, AT&T believes, those of other CLECs. BellSouth's design, as AT&T presently understands it, will have the effect of providing BellSouth with a competitive customer service advantage relative to CLECs. For example, BellSouth's web architecture requires CLECs to manually duplicate pre-ordering and ordering inputs while the customer holds on the phone; AT&T's standard gateway approach would accomplish this activity with one transaction.

In addition to increasing customer hold-time and frustration, BellSouth's architecture introduces unnecessary additional human intervention, thus decreasing order accuracy and adversely affecting customer service. To avoid this duplicate manual input scenario, AT&T and other similarly situated CLECs would be forced to develop software and procure new hardware to accommodate BellSouth's proprietary interface.

Further, BellSouth's proposal would ensure that AT&T and other CLECs would be forced to make costly software changes each time BellSouth made software changes on its side of the interface.

Finally, BellSouth appears to be attempting to minimize costs associated with developing interfaces at the expense of the CLECs. The Commission ordered that "all costs incurred to implement these interfaces shall be recovered from the industry" (Docket No. 6352-U, p.5). BellSouth, thus, has a cost recovery mechanism and should therefore proceed on a course which will provide the most efficient operational interfaces for the industry, rather than pursuing an approach which results in cost avoidance for BellSouth. AT&T also is concerned that BellSouth's manual web interface is designed to serve low volumes of traffic and introduces a capacity bottleneck for potential high volume CLECs such as AT&T. Obviously, this was not the intent of the Order.

AT&T met with BellSouth on October 14, 1996, to further understand BellSouth's web-based design. Additionally, AT&T met with BellSouth executives on October 18, 1996, to communicate AT&T's concerns with BellSouth's web-based solution. BellSouth agreed to examine AT&T's concerns and to indicate by October 25, 1996, if and when BellSouth planned to address concerns for the pre-ordering and ordering interfaces. In the October 25, 1996 meeting, BellSouth did not share any specific plan for closing the gaps between BellSouth's design and AT&T's needs. As a result, AT&T is submitting this report to the Commission to document and illustrate AT&T's concerns regarding BellSouth's proposed proprietary interface and how this proprietary interface will adversely affect the level of service received by any local service customer who chooses a local service provider other than BellSouth.

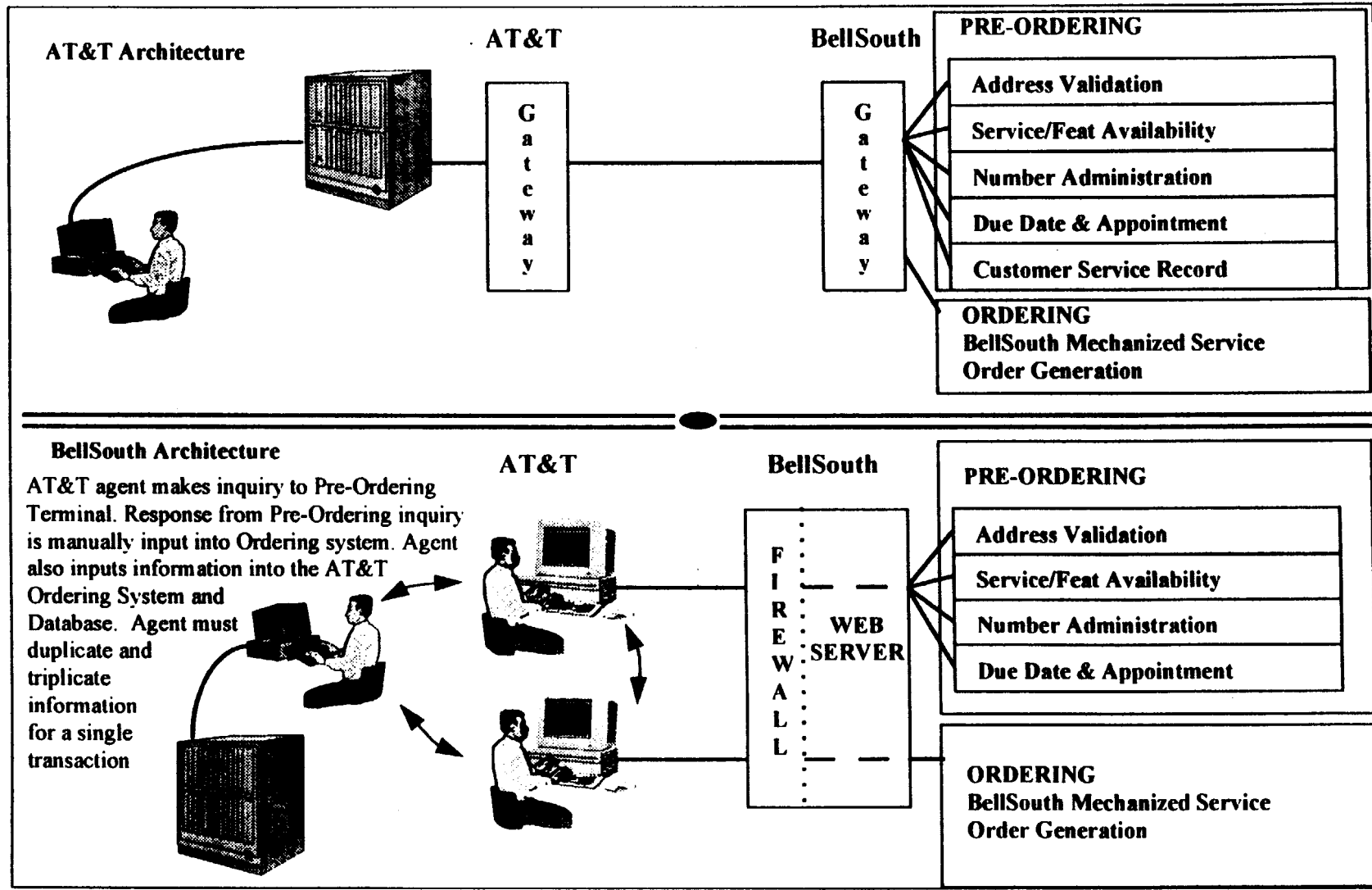
Attached to this report are the AT&T Electronic Interface Specifications Document and the material which BellSouth provided as its specification document. In addition, we have attached a printout from BellSouth's Internet page, providing information on ordering local service via the Internet. It is this very type of approach that gives rise to the concerns identified in this report. Specifically, this approach (1) does not provide a machine to machine interface, (2) does not provide "parity" of customer service capability for new entrants, (3) is little more than a simple facsimile order transmission (Indeed, BellSouth suggests printing and faxing the form if there are problems.), and (4) is an inefficient means of conducting business.

Visual Depiction of Proposed BellSouth and AT&T Interface Solutions

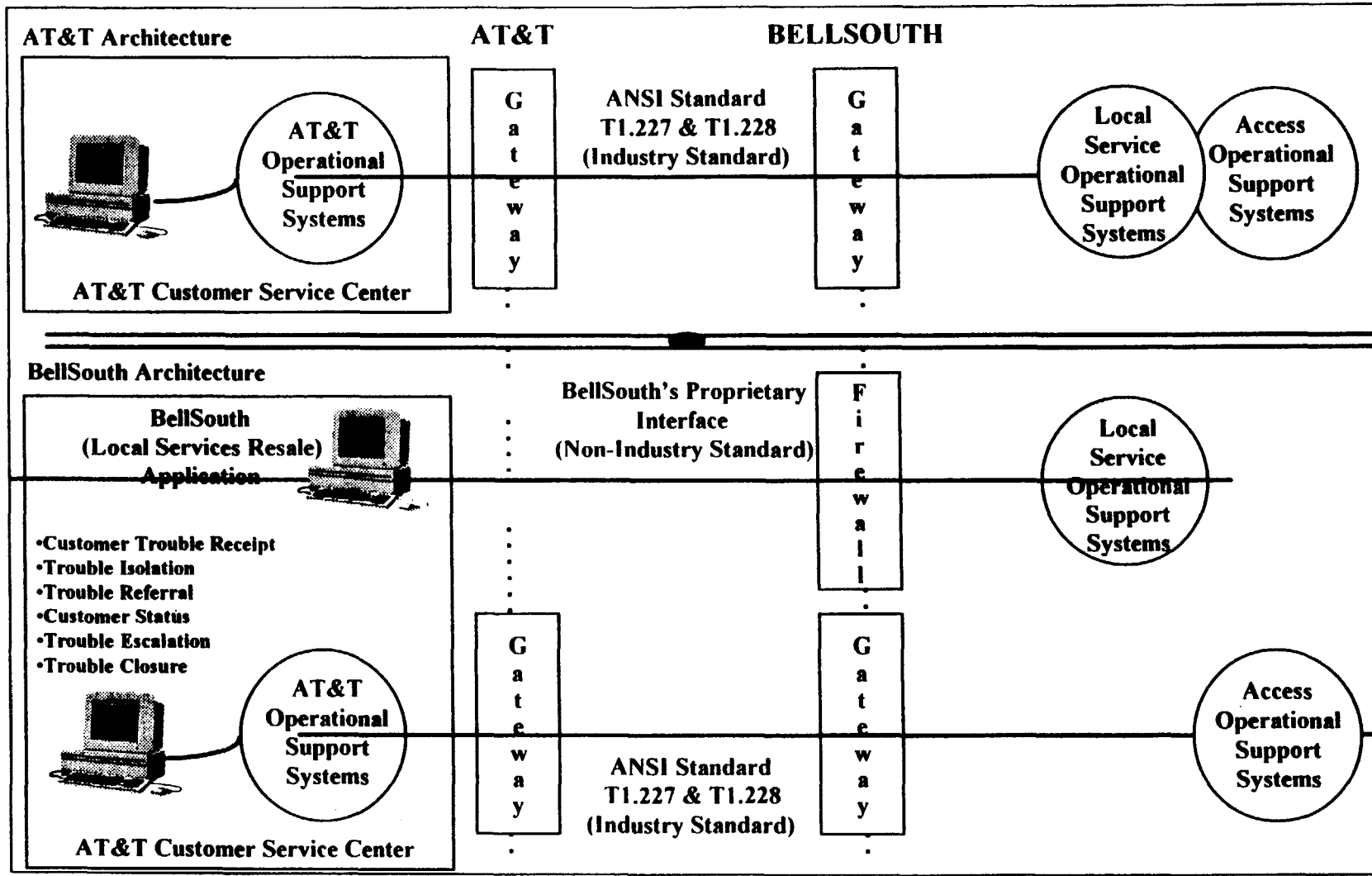
The following two pages represent pictorially the difference between BellSouth's proposed web-based solution and AT&T's proposed industry standards based solution for electronic interfaces. While on the surface BellSouth's web and direct access solutions appear to be flexible, they are plagued with shortcomings. Among the shortcomings which are depicted in the following pages are:

1. Web solution is discriminatory; it does not provide comparable functionality to that which BellSouth provides itself.
2. Abandonment of industry standards has the effect of discriminating against existing telecom industry participants that have existing infrastructure which are built upon standards -- instead, web-solution supports low volume new entrants only while disregarding the needs of high volume users. AT&T's proposal supports users of all sizes.
3. The web solution discriminates against both new entrants and existing telecom providers by making that their business practices captive to BellSouth's and requiring either duplicative data entries or expensive software and hardware additions.
4. Introduces additional manual effort for CLECs, thus impeding customer service wait times and probability of error.
5. Increases complexity for CLECs by requiring them to learn BellSouth system presentations and/or develop software to "screen scrape" and translate BellSouth applications into CLEC applications.
6. Increases complexity for CLECs by requiring them to modify systems, methods and Procedures, or both -- whenever BellSouth modifies its operational support systems interfaces.

AT&T's Comparison of the Pre-Ordering & Ordering Electronic Interface Architecture



AT&T's Comparison of the Maintenance Electronic Interface Architecture



Operational Interfaces: Problem/Opportunity

Problem: BellSouth is developing pre-ordering, ordering, maintenance and repair electronic interfaces that do NOT meet the needs specified by AT&T. *BellSouth's proposed proprietary design creates a competitive customer service disadvantage for new local market entrants.*

Opportunity: By jointly developing and implementing systems that envelop and build from existing industry standards, BellSouth and AT&T can design and deploy operating interfaces that meet the needs of new local market entrants, the intent of the Georgia PSC Order of July 11, 1996, and the explicit requirements of the Telecommunications Act of 1996.

Regulatory Foundation

AT&T Testimony to Georgia PSC:

“... what we optimally need is some kind of electronic bonding arrangements where we would have a computer to computer discussion ... and that standard, in its simplest terms, must be established in a manner that affords the resellers the opportunity to provide service equal in quality in all aspects of quality to the way the service is provided by the incumbent LEC today. We want that standard adopted.”

Georgia Docket 6352-U, Direct Testimony of AT&T Witness,
March 4, 1996, p.52.

Georgia PSC Order:

“Ordered that AT&T and BellSouth are to establish ... a Joint Implementation Team to assure effective implementation of the electronic interfaces and compliance with the Commission’s order ... BellSouth is to make fully operational and available by December 15, 1996 the *Electronic Data Interface capability* for the receipt and transmission of orders for services ... AT&T and BellSouth are to include the necessary activities for electronic interfaces in the Joint Implementation Team discussed above.”

Georgia PSC Order, July 11, 1996.

AT&T Needs Not Met

Parity with BellSouth

- ⇒ Requires *multiple terminals* to be used by AT&T's customer service representatives, adversely affecting customer service.
- ⇒ Requires multiple log-ons.
- ⇒ Requires duplicate manual data entry.
- ⇒ BellSouth's interface design does NOT allow CLECs to electronically access customer service records.

Joint/Cooperative Development of Solution

- ⇒ BellSouth's interface design is in conflict with AT&T's specifications and needs.
- ⇒ CLECs held captive to BellSouth's internal system changes.
- ⇒ Creates a proprietary interface that conflicts with existing data communications standards.
- ⇒ Creates a competitive customer service disadvantage for CLECs; is at odds with the intent of the Georgia Order and the Act.

Machine-to-Machine Data Communications

- ⇒ BellSouth's web browser design requires *human-to-machine* duplicate data inputs.
- ⇒ Degrades quality and accuracy.
- ⇒ Increases customer hold time in pre-ordering, maintenance and repair.
- ⇒ Reduces throughput capacity; disadvantages potential high-volume competitors.

LSR Interface Gap Analysis

<u>Process</u>	<u>Current LSR View</u>	<u>AT&T Target LSR View</u>	<u>BellSouth 4/1/97 View*</u>	<u>Comments</u>	<u>Why BST 4/1/97 View Unacceptable</u>
Pre Ordering					
Address Validation	<ul style="list-style-type: none"> LAN-LAN 56kb/Online 	<ul style="list-style-type: none"> EDI Data Standard EC-Lite Msg. Protocol TCP/IP Transmission Protocol and NDM (Connect:Direct) File Transfer 	<ul style="list-style-type: none"> ISI-Like Tagged Value Data Standard HTML Msg. Protocol TCP/IP Transmission Protocol 	<ul style="list-style-type: none"> Interface gaps exist for Data Standard and Msg. Protocol Limited gaps exist between Data Element definitions If BST provides a batch feed, NDM would be used. 	<ul style="list-style-type: none"> BST Proprietary Interface does not comport with industry standard BST Web solution does not meet the parity requirements of the Act Parity issues: increased response time delay, complexity, increased talk time
Service/Feature Availability	<ul style="list-style-type: none"> NDM (Connect:Direct) File Transfer 	<ul style="list-style-type: none"> EDI Data Standard EC-Lite Msg. Protocol TCP/IP Transmission Protocol and NDM (Connect:Direct) File Transfer 	<ul style="list-style-type: none"> ISI-Like Tagged Value Data Standard HTML Msg. Protocol TCP/IP Transmission Protocol 	<ul style="list-style-type: none"> Interface gaps exist for Data Standard and Msg. Protocol Limited gaps exist between Data Element definitions BST will continue to provide NDM batch feed. 	<ul style="list-style-type: none"> BST Proprietary Interface discriminates against existing industry participants who have existing infrastructure BST Web solution developed independent of AT&T (inconsistent with GA PSC order)
Tel Number Assignment	<ul style="list-style-type: none"> NDM (Connect:Direct) File Transfer 	<ul style="list-style-type: none"> EDI Data Standard EC-Lite Msg. Protocol TCP/IP Transmission Protocol 	<ul style="list-style-type: none"> ISI-Like Tagged Value Data Standard HTML Msg. Protocol TCP/IP Transmission Protocol 	<ul style="list-style-type: none"> Interface gaps exist for Data Standard, Msg. Protocol and Data Elements 	<ul style="list-style-type: none"> BST's system modifications drive downstream system modification to CLECs
Due Date/ Appointment Schedule	<ul style="list-style-type: none"> Manual - Paper Interval Guide 	<ul style="list-style-type: none"> EDI Data Standard EC-Lite Msg. Protocol TCP/IP Transmission Protocol 	<ul style="list-style-type: none"> ISI-Like Tagged Value Data Standard HTML Msg. Protocol TCP/IP Transmission Protocol 	<ul style="list-style-type: none"> Interface gaps exist for Data Standard, Msg. Protocol and Data Elements 	
Customer Service Records	<ul style="list-style-type: none"> Manual - Letter of Agency or Manual - Three Way Call 	<ul style="list-style-type: none"> EDI Data Standard EC-Lite Msg. Protocol TCP/IP Transmission Protocol 	<ul style="list-style-type: none"> Manual - Letter of Agency or Manual - Three Way Call 	<ul style="list-style-type: none"> Interface gaps exist for Data Standard, Msg. Protocol and Data Elements <p>Note: BST will not provide CSR information mechanically</p>	<ul style="list-style-type: none"> Parity issues: not immediate access like BST, increased talk time, poorer customer service

LSR Interface Gap Analysis

<u>Process</u>	<u>Current LSR View</u>	<u>AT&T Target LSR View</u>	<u>BellSouth 4/1/97 View*</u>	<u>Comments</u>	<u>Why BST 4/1/97 View Unacceptable</u>
Ordering/Provisioning					
Customer Spec (LSR)	<ul style="list-style-type: none"> • EDI Data Standard • EDI Msg. Protocol • VAN-VAN Transmission Protocol (BST reentry for all orders) 	<ul style="list-style-type: none"> • EDI Data Standard • EDI Msg. Protocol • TCP/IP Transmission Protocol (Flow through order entry) 	<ul style="list-style-type: none"> • ISI-Like Tagged Value Data Standard • HTML Msg. Protocol • TCP/IP Transmission Protocol (Flow through order entry) 	<ul style="list-style-type: none"> • Interface gaps exist for Data Standard and Msg. Protocol • Limited gaps exist between Data Element definitions • BST verbally committed to support an EDI flow through order entry interface for selected services on 12/31/96. 	<ul style="list-style-type: none"> • BST Proprietary Interface does not comport with industry standard • BST Web solution does not meet the parity requirements of the Act • Parity issues: increased response time delay, complexity, increased talk time • BST Proprietary Interface discriminates against existing industry participants who have existing infrastructure • BST Web solution developed independent of AT&T (inconsistent with GA PSC order) • BST's system modifications drive downstream system modification to CLECs
Maintenance & Repair					
	<ul style="list-style-type: none"> • Manual - Phone Call 	<ul style="list-style-type: none"> • EBI T1.227/228 Data Standard • EC Msg. Protocol • X.25 Transaction Protocol 	<ul style="list-style-type: none"> • LAN-to-LAN • Telnet Access • Character Based 	<ul style="list-style-type: none"> • Interface gaps exist 	<ul style="list-style-type: none"> • CLECs are required to enter trouble tracking information in their system and BST's system • CLECs are required to "sign-on" to multiple BST systems to exchange information • BST's system modifications drive downstream system modification to CLECs